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1: 16 MJ 4101

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

2016 JUL 12 PM 12: 11
CLERK U.S. DISTRICT COURT
NO. 16-CR-00262-BYP
STATE OF OHIO
CLEVELAND

I. Introduction

1. I have been employed as a Special Agent (“SA”) with the United States Secret Service (“USSS”) since 2005. During that time, I have received formal training in the investigation of threats directed towards persons protected by the USSS, including the President of the United States. I have received training from the Federal Law Enforcement Training Center in Glynco, GA, and the USSS Special Agent Training Course in Beltsville, MD.

2. I make this affidavit in support of a criminal complaint against and arrest warrant for JASON A. BALLARD (“BALLARD”), for violating Title 18, United States Code, Section 871 (Threats against the President and successors to the Presidency). More specifically, and as described more fully below, there is probable cause to believe that BALLARD (a) knowingly and willfully made a true threat to take the life of or to inflict bodily harm upon a victim, and (b) the victim was the President of the United States.

3. The information contained in this affidavit is based on my personal knowledge and review of records, documents, and other physical evidence obtained during this investigation, as well as information conveyed to me by other law enforcement officials and witnesses. It does not include each and every fact known by the government, but only those necessary to support a finding of probable cause.

II. Probable Cause

4. On Tuesday, July 5th, 2016, at approximately 9:30 A.M. EST, the USSS, Protective Intelligence Division, received a phone call from a person who identified himself as BALLARD.

5. BALLARD stated he had purchased a bus ticket to travel to Washington, D.C., and planned “to shoot up the White House.” BALLARD claimed to have a .22 caliber handgun “available.” When asked why he wants to shoot the White House, BALLARD said he does not like Presidential Candidate Trump. BALLARD provided his current location as Redacted: Loc.R. 49.1.1(a)(5), Cleveland, OH. BALLARD also provided his date of birth as Redacted: Loc.R. 49.1.1(a)(3), and his Social Security number as Redacted: Loc.R. 49.1.1(a)(1).

6. On Tuesday, July 5, 2016, BALLARD was located at Redacted: Loc.R. 49.1.1(a)(5), Cleveland, OH, by USSS SA Brandon Tisdale, Cleveland Police Department (“CPD”) Officer Wagner, Badge #1802, CPD Officer Sunerauer, Badge #2570, and Affiant. CPD Officers conducted a query of BALLARD via CPD dispatch and learned that BALLARD had an outstanding warrant with CPD. They arrested him. BALLARD was then transported to the Cleveland City Jail located at 1200 Ontario Street, Cleveland, OH.

7. On Tuesday, July 5, 2016, USSS Special Agents met with Frederick Ware at his address of Redacted: Loc.R. 49.1.1(a)(5), Cleveland, OH. Mr. Ware is BALLARD’s brother-in-law. Mr. Ware confirmed BALLARD has been residing with him and his family for approximately four months. Mr. Ware permitted BALLARD to stay at his residence while BALLARD established income to get his life in order. BALLARD has

no source of income, no vehicle, and no telephone. Mr. Ware knew that BALLARD took several medications, but he was unaware why BALLARD was prescribed the medications. Mr. Ware was aware that BALLARD failed to take some of his medications the previous day. Mr. Ware occasionally let BALLARD use his telephone to make calls.

8. On Tuesday, July 5, 2016, USSS SA Brandon Tisdale and I interviewed BALLARD. BALLARD was advised of his Miranda Rights and verbally agreed to voluntarily waive his rights by speaking with SA Brandon Tisdale and Affiant.

9. When BALLARD was asked what he did on the morning of July 5, 2016, he stated that he called USSS Headquarters and said he wanted to "kill President Trump." BALLARD was informed that Presidential Candidate Trump was not the President of the United States and President Obama is still in office. BALLARD said he wanted to kill Presidential Candidate Trump because he believed Presidential Candidate Trump was the current President of the United States. In addition, BALLARD stated he wanted to kill Presidential Candidate Trump because Presidential Candidate Trump "hates the middle-class."

10. BALLARD stated he has a .22 gun, which he hid in some bushes on Detroit Avenue near West 31st Street a couple days ago. BALLARD claimed he does not know how to use a gun, but heard it was easy. He obtained the gun from an unknown man whom he performed sexual favors for in exchange for the gun. BALLARD claimed he also hid \$200 in U.S. currency with the gun in the bushes, which he was going to use to purchase a Greyhound Bus ticket to Washington, D.C.

11. BALLARD insisted he was not taken seriously the last time he threatened

the President of the United States, so he wanted to show everyone that he was serious.

12. In 2008, BALLARD was arrested by the USSS and convicted of violating Title 18, United States Code, Section 871 (Threats against the President and successors to the Presidency). At that time, BALLARD admitted to authoring the letters which contained threats to kill the President of the United States and threats to bomb the White House.

13. BALLARD said that he still intended to travel to Washington, D.C., but now he would shoot President Obama and the White House. BALLARD then claimed to know a corrections officer who would help him escape jail. In addition, BALLARD said it was easy to escape hospitals due to the lack of security and he had spent the last year and a half looking at hospitals in the Cleveland area for escape routes.

14. BALLARD said he was originally planning to take a Greyhound Bus on July 5, 2016, to Washington, D.C., and then shoot at the White House through the fence, in hopes of hitting the President of the United States. He said if he could not follow through with his plan tonight, he would do it another day, or instead target the Republican National Convention in Cleveland, OH.

15. BALLARD admitted to having attempted suicide numerous times, the last attempt being in 2006. He was most recently diagnosed, while in prison, as having a personality disorder, for which he is taking medication. BALLARD said he had not taken his medication the previous day.

16. BALLARD was informed that we were going to take him to locate the gun he hid in the bushes. BALLARD said he was tired and would not cooperate. BALLARD insisted that he knew where the gun was hidden and he would not tell law enforcement

because he wanted to use the gun at a later date.

17. On July 5, 2016, USSS SA Brandon Tisdale, CPD Officer Wagner and CPD Officer Sunerauer, and Affiant searched all of the bushes along Detroit Avenue between W. 29th Street and W. 32nd Street, but could not locate a gun.

18. Further investigation revealed that BALLARD authored threatening letters directed towards the President of the United States on numerous occasions to include incidents in 2007, 2008, 2011, 2012, 2013, and 2014.

III. Conclusion

19. Based on the above information, I respectfully submit there is probable cause to believe that JASON A. BALLARD did knowingly and willfully make a direct threat to take the life of or inflict bodily harm to the President of the United States, in violation of Title 18, United States Code, Section 871 (Threats against the President and successors to the Presidency).

Phillip Hogan
Special Agent, U.S. Secret Service
Cleveland Field Office

Subscribed and sworn to before me this 11th day of July, 2016.

MAG. JUDGE VECCHIARELLI

NANCY A. VECCHIARELLI
United States Magistrate Judge